

PAMELA JOHNSON - 8/26/2020

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

TAMMY ALVARADO, et al.	§	
	§	
Plaintiffs,	§	
	§	
VS.	§	CIVIL ACTION NO. 4:19-cv-02148
	§	
CLARK, LOVE & HUTSON,	§	
GP, et al.	§	
	§	
Defendants.	§	

ORAL AND VIDEOTAPED DEPOSITION OF
PAMELA JOHNSON
AUGUST 26, 2020

REPORTED REMOTELY DUE TO THE
COVID-19 STATE OF DISASTER

Oral and videotaped deposition of Pamela Johnson, produced as a witness at the instance of the Defendant and duly sworn, was taken in the above styled and numbered cause on Wednesday, August 26, 2020, from 9:25 a.m. to 6:56 p.m., before Rene White Moarefi, CSR, CRR, RPR in and for the State of Texas, reported by computerized stenotype machine, remotely from Mission Viejo, California, pursuant to the Federal Rules of Civil Procedure and any provisions stated on the record herein.

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713.840.8484

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A P P E A R A N C E S

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1 FOR THE DEFENDANTS JAMES LEE, JR., JAMES LEE LAW
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6
7 Also Present:

8 MS. CLARA REDMOND (VIA VIDEOCONFERENCE)
MR. SCOTT LOVE (VIA VIDEOCONFERENCE)
9 MR. SAM AMONG - VIDEOGRAPHER AND EXHIBIT TECH
(VIA VIDEOCONFERENCE)

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1 MS. LANDERS: She was frozen, Billy.
2 If you could ask her that again.

3 BY MR. SHEPHERD:

4 Q. Ms. Johnson, I'm going to -- so you don't
5 think I'm crazy, you froze, so I'm going to re -- I
6 try not to ask the same question two times in a row,
7 but I'm going to reask that. Is that okay?

8 MS. LANDERS: She froze again.

9 (Comments off the record.)

10 MR. SHEPHERD: Let's go off the
11 record.

12 THE VIDEOGRAPHER: We're off the
13 record. Time is 9:46 a.m.

14 (Short recess.)

15 THE VIDEOGRAPHER: We're back on
16 record. Time is 10:48 a.m.

17 BY MR. SHEPHERD:

18 Q. Ms. Johnson, I'm going to reask the last
19 question I asked you because we didn't get an answer
20 to it. And that is you had never received any
21 written materials from something called the Lee &
22 Murphy Law Firm, from James Lee, from Erin Murphy,
23 or something called James Lee Law Firm, PC, have
24 you?

25 A. No.

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1 Q. You have never hired the Lee & Murphy Law
2 Firm, James Lee, Erin Murphy, or James Lee Law --
3 excuse me -- James Lee Law Firm, PC, to represent
4 you, true?

5 A. No, that's true.

6 Q. All right. And you have never agreed to
7 let the Lee & Murphy Law Firm, James Lee, Erin
8 Murphy, or James Lee Law Firm, PC, represent you,
9 true?

10 A. True.

11 Q. And, to your knowledge, the James Lee Law
12 Firm, James Lee, Erin Murphy, and the Lee & Murphy
13 Law Firm have never agreed to represent you, true?

14 A. True.

15 Q. To your knowledge, the James Lee Law
16 Firm, PC, James Lee, Erin Murphy, and the Lee &
17 Murphy Law Firm have never represented you in any
18 matter, true?

19 A. True.

20 Q. Ms. Johnson, we're going to put up on the
21 screen what we've marked as Exhibit Number 1 to your
22 deposition.

23 (Exhibit 1 marked.)

24 BY MR. SHEPHERD:

25 Q. And you would agree, ma'am, that these

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1 REPORTER'S CERTIFICATION
2 DEPOSITION OF PAMELA JOHNSON
3 TAKEN AUGUST 26, 2020

4 REPORTED REMOTELY DUE TO THE
5 COVID-19 STATE OF DISASTER

6 I, Rene White Moarefi, Certified Shorthand
7 Reporter and Notary Public in and for the State of
8 Texas, hereby certify to the following:

9 That the witness, Pamela Johnson, was duly
10 sworn by the officer and that the transcript of the
11 oral deposition is a true record of the testimony
12 given by the witness;

13 That the original deposition was delivered
14 to BILLY SHEPHERD;

15 That a copy of this certificate was served
16 on all parties and/or the witness shown herein on
17 _____.

18 I further certify that pursuant to FRCP No.
19 30(f)(i) that the signature of the deponent was
20 requested by the deponent or a party before the
21 completion of the deposition and that the signature
22 is to be returned within 30 days from date of
23 receipt of the transcript. If returned, the
24 attached Changes and Signature Page contains any
25 changes and the reasons therefor.

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1 I further certify that I am neither counsel
2 for, related to, nor employed by any of the parties
3 in the action in which this proceeding was taken,
4 and further that I am not financially or otherwise
5 interested in the outcome of the action.

6 Certified to by me this 8th day of
7 September, 2020.

8
9
10 
11 Rene White Moarefi, CSR, CRR,

12 My notary commission expires 10-28-22



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